

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

TERRAFORM LABS PTE. LTD. and DO  
HYEONG KWON,

Defendants.

Civil Action No. 23 Civ. 1346 (JSR)

Hon. Jed S. Rakoff

**NOTICE OF MOTION TO RECONSIDER THE COURT'S ORDER  
TO EXCLUDE THE OPINIONS OF RAJ UNNY**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Evid. 702, Local Civil Rule 6.3, and the Court's December 4, 2023 Order, which granted Defendants Terraform Labs Pte. Ltd. ("TFL") and Kwon Do Hyeong request to extend the deadline for filing any motion for reconsideration of the Court's ruling on the parties' Daubert motions (ECF No. 130) until four business days after the issuance of a follow-up opinion explaining the reasons for that order, upon the accompanying Memorandum of Law and the exhibits thereto, Defendants respectfully move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at a date and time to be determined by the Court, for an Order reconsidering and vacating the Court's Order granting the Securities and Exchange Commission's Daubert Motion to Exclude Testimony and Opinions of Raj Unny (ECF No. 87) and denying Securities and Exchange Commission's Daubert Motion to Exclude Testimony and Opinions of Raj Unny.

Date: January 4, 2024

Respectfully submitted,

/s/Mark G. Califano

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*Counsel for Defendant Do Hyeong Kwon*

**CERTIFICATE OF SERVICE**

I, Mark G. Califano, certify that I caused a true and correct copy of the foregoing to be served on all counsel of record via the Court's ECF system on January 4, 2024.

/s/ Mark G. Califano  
Mark G. Califano